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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION OF DISMISSAL
OF HAROLD NYANJOM WITHOUT
PREJUDICE**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 WHEREAS, on July 14, 2020, this litigation was commenced against Google LLC (Dkt.
2 1);

3 WHEREAS, on November 11, 2020, Harold Nyanjom was added as a named Plaintiff to
4 the Amended Complaint in this litigation (Dkts. 58, 60);

5 WHEREAS, the parties agree that, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of
6 Civil Procedure, Mr. Nyanjom will dismiss his claims against Defendant Google LLC, without
7 prejudice to participate and/or recover as a class member in this action, with each party
8 responsible for their attorneys' fees and costs;

9 WHEREAS, the parties agree that this dismissal only applies to Mr. Nyanjom's claims
10 against Defendant Google LLC;

11 WHEREAS, counsel for Mr. Nyanjom represent that Mr. Nyanjom will not be added (or
12 seek to be added) as a named plaintiff to this litigation at any point in the future;

13 NOW THEREFORE the parties stipulate that pursuant to Rule 41(a)(1)(A)(ii) of the
14 Federal Rules of Civil Procedure, named Plaintiff Harold Nyanjom is dismissed without prejudice
15 to participate and/or recover as a class member in this action, with each party responsible for their
16 attorneys' fees and costs.

17 IT IS SO STIPULATED.

18 DATED: October 14, 2022

WILLKIE FARR & GALLAGHER, LLP

19 By: /s/ Benedict Y. Hur
20 Benedict Y. Hur

21 *Attorneys for Defendant Google LLC*

22 DATED: October 14, 2022

23 MORGAN & MORGAN
COMPLEX LITIGATION GROUP

24 By: /s/ Ryan J. McGee
25 Ryan J. McGee

26 *Attorneys for Plaintiffs*

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: October 14, 2022

MORGAN & MORGAN
COMPLEX LITIGATION GROUP

/s/ Ryan J. McGee
Ryan J. McGee